

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
W. R. GRACE & CO., et al., ¹)	Case No. 01-01139 (KJC)
)	(Jointly Administered)
Reorganized Debtors.)	
)	Re: docket nos. 32600, 32619, 32633, 32665, 32687
)	& 32689

**CERTIFICATION OF COUNSEL REGARDING [PROPOSED] SECOND AMENDED
SCHEDULING ORDER RE THIRTY-EIGHTH OMNIBUS OBJECTION TO
CLAIMS FILED BY SGH ENTERPRISES, INC. (SUBSTANTIVE AND NON-
SUBSTANTIVE OBJECTION)**

1. On March 15, 2016, the Court entered the *Scheduling Order re Thirty-Eighth Omnibus Objection to Claims Filed by SGH Enterprises, Inc. (Substantive and Non-Substantive Objection)* [Docket no. 32665] (the “Scheduling Order”).²

2. In relevant part, the Scheduling Order ordered that parties are to file their cross-motions (if any) for summary judgment (the “Summary Judgment Motions”) on or before the first business day on or after the 75th day after March 15, 2016, which is May 31, 2016. The Scheduling Order further ordered that the non-moving party file its responses to the Summary Judgment Motions no later than thirty (30) days thereafter, which is June 30, 2016. The Scheduling Order also ordered that the moving party file its replies fifteen (15) days thereafter, which is July 15, 2016. Finally, the Scheduling Order sets the first business day on or after the 180th day after the deadline for filing replies, which is January 11, 2017 (the “Discovery”).

¹ The Reorganized Debtors comprise W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc., or “Grace”) and W. R. Grace & Co.-Conn. (“Grace-Conn.”).

² Capitalized terms not defined herein shall have the meaning ascribed to them in the *First Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code of W. R. Grace & Co., et al., the Official Committee of Asbestos Personal Injury Claimants, the Asbestos PI Future Claimants’ Representative, and the Official Committee of Equity Security Holders as Modified Through December 23, 2010* [Docket No. 26368] (the “Plan”).

Commencement Date”), to commence discovery, and thereafter sets certain other dates for the completion of discovery and post-discovery dispositive motions.

3. On May 23, 2016, the Reorganized Debtors filed a *Certification of Counsel Regarding [Proposed] Amended Scheduling Order re Thirty-Eighth Omnibus Objection to Claims Filed by SGH Enterprises, Inc. (Substantive and Non-Substantive Objection)* [Docket no. 32687] (the “Certificate of Counsel”), in which the Reorganized Debtors reported that they and SGH Enterprises, Inc. (“SGH”) were engaged in settlement negotiations regarding the claims filed by SGH (the “SGH Claims”). The Certificate of Counsel requested the Court enter an order delaying the filing deadline for the Summary Judgment Motions by fifteen days, to June 15, 2016, and commensurately delaying the deadlines for filing responses and replies to July 15, 2016, and August 1, 2016 (the first business day fifteen days after the deadline for filing responses), respectively, would aid the parties in expeditiously resolving the SGH Claims. The Discovery Commencement Date of January 11, 2017, was to remain unchanged.

4. On May 24, 2016, the Court entered its *Amended Scheduling Order re Thirty-Eighth Omnibus Objection to Claims Filed by SGH Enterprises, Inc. (Substantive and Non-Substantive Objection)* [Docket no. 32689] (the “Amended Scheduling Order”).

5. The Reorganized Debtors and SGH are continuing to negotiate a settlement of the SGH Claims. To further that negotiation process, the parties have conferred and agreed to further extend the filing deadline for the Summary Judgment Motions by two weeks, to June 29, 2016, and commensurately delaying the deadlines for filing responses and replies to July 28, 2016, and August 12, 2016, respectively, would aid the parties in expeditiously resolving the SGH Claims. The Discovery Commencement Date of January 11, 2017, is to remain unchanged.

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6. The Reorganized Debtors therefore respectfully request the Court enter the amended scheduling order attached hereto as Exhibit A (the "Proposed Second Amended Scheduling Order").

Dated: June 10, 2016

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